

Lumen Christi Catholic Community Justice Ministries (Lumen Christi Catholic Community Justice Ministries)

Summary Statement

As members of Lumen Christi Catholic Community Justice Ministries, we approach the cleanup of Ford Area C guided by Catholic Social Teaching and Pope Francis's call in *Laudato Si'* to care for our common home, protect human health, and act with responsibility toward future generations. These principles compel us to advocate for solutions that are precautionary, permanent, and just — especially when environmental harm and uncertainty persist. For these reasons, we respectfully urge the Minnesota Pollution Control Agency to select Alternative 6, full cleanup, as the option that best safeguards the Mississippi River, honors the land and its history, and ensures environmental risk is not passed on to future generations or the public.

To the Minnesota Pollution Control Agency:

We, the members of the Lumen Christi Catholic Community Justice Ministries, respectfully urge MPCA to reconsider its proposed selection of Alternative 4 for the cleanup of Ford Area C and instead select Alternative 6 — full cleanup.

During your public meeting on January 15, several community members asked about the assumptions informing your agency's assessment of risk on the site. Your staff's answers made it clear that your analysis did not consider what we see as significant factors:

- The likelihood of more severe floods because of climate change
- The possibility of land uses in the near future requiring more stringent cleanup than required to meet industrial standards. Specifically, the possibility of dam removal would impact the site and its potential uses.
- The potential instability and increased hazardous waste exposure caused by the steepness of the waste pile's slopes. The slopes exhibit significant instability and erosion, particularly on the south side where hazardous waste is becoming exposed. Over time, these slopes will become increasingly unstable, exposing more waste and sending more material into the Mississippi River and Hidden Falls Regional Park.

We ask that your analysis consider:

- The impact of 500- year and 1000-year floods on the site and movement of contamination beyond the site.
- The cost effectiveness of remediating the site to a more stringent standard than would be required by perpetual industrial use, specifically considering the value of the land for recreational or other non-industrial uses.
- The necessity for additional study of the steep slopes issue to reduce the slope and increase the safety and stability.
- An alternative slope stabilization system with better habitat and visual outcomes than riprap.

Adding more material to the waste pile will only increase the cost and difficulty of removal in the future. Riprap has no habitat value and would worsen the pile's appearance for river and park users. We also ask that the MPCA take steps to protect the public from the possibility that Ford will either be insolvent or otherwise unable to fund cleanup to a higher standard in the future. Ford is a viable funder for cleanup costs now, and the interests of Minnesotans are better served by either requiring

Ford to clean up the site fully now or to provide financial assurance for future cleanup funds. MPCA has asserted that it lacks authority to require financial assurance from Ford for future risks. If Alternative 4 is implemented and Ford later severs liability, unforeseen environmental damage including impacts from climate change, flooding, or infrastructure changes could fall to taxpayers. This interpretation warrants independent legal review, including consultation with the Minnesota Attorney General's Office.

Ford Area C deserves careful, respectful, and forward-looking action. We respectfully ask MPCA to select Alternative 6 and engage fully with the community and our elected officials to ensure a just and lasting outcome.

Respectfully submitted,

The Social Justice Ministries of Lumen Christi Catholic Community
Highland Park, St. Paul